

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:

ATLAS ACQUISITIONS LLC, *et al.*,

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MISC CASE NO: 16-00302

**EMERGENCY MOTION OF AKIN GUMP STRAUSS HAUER AND FELD
LLP TO WITHDRAW AS COUNSEL TO JOEL TUCKER AND
MOTION FOR A CONTINUANCE OF THE OCTOBER 11, 2016 HEARING**

THIS MOTION SEEKS EMERGENCY RELIEF THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING AND SEND A COPY TO THE MOVING PARTY. YOU MUST SPECIFICALLY ANSWER EACH PARAGRAPH OF THIS EMERGENCY MOTION AND STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE COURT MAY TREAT THE MOTION AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

**TO THE HONORABLE MARVIN ISGUR,
UNITED STATES BANKRUPTCY JUDGE:**

Akin Gump Strauss Hauer & Feld LLP (“**Akin Gump**”) hereby submits its Motion to Withdraw as Counsel to Joel Tucker (the “**Motion to Withdraw**”) in the above-captioned bankruptcy and its Motion for a Continuance of the October 11, 2016 Hearing (the “**Motion for a Continuance**”). In support thereof, Akin Gump states as follows:

1. By this Motion to Withdraw, Akin Gump seeks to withdraw as counsel for Joel Tucker in this Miscellaneous Proceeding. Notice to the other parties' counsel in this case has been given. As of the time of this filing, only counsel for Katrina Jones has stated any objection to the withdrawal. Counsel for Ms. Jones stated that he objects to the withdrawal to the extent the withdrawal causes delay.

2. This withdrawal is sought after discussion with Mr. Joel Tucker.

3. Contemporaneously with its Motion to Withdraw, Akin Gump respectfully seeks a continuance of 30 days of the hearing scheduled for October 11, 2016. Akin Gump respectfully requests that the Court continue the October 11, 2016 hearing until a later date to allow Mr. Tucker time to obtain substitute counsel for this proceeding.

4. The Motion to Withdraw and the Motion for a Continuance are not sought for the purposes of delaying the resolution of the matters before this Court. A continuance of 30 days is a reasonable and short amount of time that would afford Mr. Tucker the opportunity to obtain counsel while still allowing this Court and the parties in this action the ability to hear and argue the issues in this proceeding in a reasonably timely period.

5. All further notices should be sent to Mr. Joel Tucker at 4425 W 72nd St, Prairie Village, Kansas 66208 or to his email address at joelt@hpd.com.

WHEREFORE, Akin Gump respectfully requests that the Court enter an Order allowing Akin Gump to withdraw as counsel for Joel Tucker and for an Order continuing the October 11, 2016 hearing to date that is at least 30 days after October 11, 2016.

Dated: October 5, 2016

AKIN, GUMP, STRAUSS, HAUER & FELD, L.L.P.

By: /s/ Jim Wetwiska

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